

NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
Site Mitigation and Brownfields Reuse Program
8800 Cal Center Drive
Sacramento, California 95826

Project Title: FMC Corporation, Interim Removal Action Workplan for Soil

Project Location: 1200 Graphics Drive, Modesto County: Stanislaus

Project Description: The Interim Removal Action (IRAW) consists of the excavation and off-site disposal of approximately 3,100 cubic yards of soil having barium, arsenic, polynuclear aromatic hydrocarbons (PAHs), at concentrations exceeding levels that are protective of human health for commercial use and concentrations of total petroleum hydrocarbons (TPH) that are protective of water quality and human health.

Background:

This 43 acre Site is located at 1200 Graphics Drive, Modesto California, in the area now generally bounded by Graphics Drive to the west where Fisher Graphics and the Modesto Irrigation District (MID) operations yard are located; Woodland Avenue on the north where the MID operations yard is also located; North 9th Street on the northeast and parallel to the alignment of the Union Pacific Railroad; commercial property to the east where Vanari Brothers, Foster Farms, and Height Auto Dismantlers are located; and Highway 99 on the south. The Site property is more specifically described as County Assessor's Parcel Number: 029-1313-660. The distance to residences is approximately ½ mile, south of Highway 99.

The Site owned by FMC Corporation was formerly used to process barium and strontium sulfate ores, beginning with barite in the 1920s and celestite in the 1960s using petroleum coke as a reducing agent. Barium and strontium were precipitated in ponds using sodium carbonate. Various other chemicals were manufactured including sodium sulfide and arsenic compounds. These manufacturing activities ceased in 1984 and have resulted in soil and groundwater contamination at the Site. Investigation and remediation activities are being overseen by the California Department of Toxic Substances Control (DTSC) in consultation with the Regional Water Quality Control Board, Central Valley Region (RWQCB) in accordance with the Amended Voluntary Cleanup Agreement (VCA), HSA-1A 02/03-003, dated June 15, 2005.

The proposed future land use of the Site will be a commercial/industrial business park currently identified as the "Kansas-Woodland Business Park". The IRAW will allow for the construction of the infrastructure (e.g., roads and utilities) of the future business park.

Following the IRAW, a Remedial Action Plan (RAP) will be prepared which incorporates the IRAW and addresses the continued operation of an existing groundwater extraction and treatment system to mitigate historical impacts to groundwater and address any remaining potential impacts from site soils to groundwater. Application of the California Environmental Quality Act (CEQA) for the RAP will be addressed separately from the IRAW.

Project Activities:

Pursuant to the "Interim Action Removal Action Workplan for Soil, FMC Corporation, 1200 Graphics Drive, Modesto, Stanislaus County, California, April 2006", the interim removal action activities will include the following:

- Removal of approximately 3,100 cubic yards of soils containing metal and organic contaminants for offsite disposal. The Interim RAW establishes a cleanup goal for arsenic at 27 milligrams per kilogram (mg/kg), PAHs based on a benzo(a) pyrene equivalent at 1.2 mg/kg, barium at 58,400 mg/kg, and TPH at 1,000 mg/kg. Most excavation will be for the ground surface to approximately 2 feet below ground surface. Some excavation will be up to 10 feet below the ground surface.
- Excavated soil will be placed on heavy mil plastic sheeting in designated locations on the Site and covered with heavy mil plastic sheeting until analytical results are received and disposal requirements are determined prior to loading and transportation activities.

- The soil will be tested for classification. Based on existing analytical data for soils, it is anticipated that the excavated soil will be classified as follows:
 - Contaminated, California hazardous waste. Approximately 2,400 cubic yards (4,400 tons). Contaminated soils will be excavated from the site and removed to an authorized disposal site consistent with DTSC statutory requirements.
 - Contaminated, non-hazardous waste. Approximate 700 cubic yards (1,300 tons). Contaminated soils will be excavated from the site and removed to an authorized disposal site.
- Excavation and loading will be accomplished by conventional methods, including backhoe, front-end loader, dump truck and other equipment, as necessary. The excavation plan will incorporate measures to prevent the off-site discharge of hazardous substances. The excavation contractor will be experienced, trained and qualified in the handling of hazardous substances and will be required to prepare and adhere to its own worker health and safety plan, including compliance with California Occupational Health and Safety Code and any grading permit requirements.
- Depending on their final classification, contaminated soils (i.e., soil with contaminant concentrations greater than applicable regulatory thresholds) will be disposed of at either the Waste Management, Inc. Altamont Landfill in Livermore, California or the Chemical Waste Management Landfill in Kettleman City, California.
- Excavated areas will be filled in/graded to the existing grade of the Site.
- The duration of the project, including excavation and offsite transport of affected soils is expected to be 60 to 90 days.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: FMC Corporation

Exemption Status: (check one)

- ☐ Ministerial [PRC, Sec. 21080 (b) (1); CCR, Sec. 15268]
☐ Declared Emergency [PRC, Sec. 21080 (b) (3); CCR, Sec. 15269 (a)]
☐ Emergency Project [PRC, Sec. 21080 (b) (4); CCR, Sec. 15269 (b) (c)]
☒ **Categorical Exemption: Class 30, Section 15330**
☐ Statutory Exemptions: [State code section number]
☐ General Rule [CCR, Sec. 15061(b) (3)]

Exemption Title: Minor cleanup actions to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or hazardous substance.

Reasons Why Project is Exempt:

This Class 30 action is a minor cleanup action to be taken to prevent, minimize, stabilize, mitigate, or eliminate the release or threat of release of a hazardous waste or substance which is small removal action costing approximately \$780,000. The site is not on the Hazardous Waste and Substances Sites List (pursuant to Government Code Section 65962.5) and is not near any identified biological or cultural resource areas. The project will not have a significant effect on the environment because of the following:

1. The Site is surrounded by commercial property and the distance to residences is approximately ½ mile, south of Highway 99.
2. Trucks used for off-site disposal will enter and exit the property from the gated entrance on Graphics Drive. Access to Highway 99 will be via Graphics Drive to the south bound ramp located on Kansas Avenue. There are no residences on this route. Trucks shall be staged to avoid traffic impacts during peak commute hours. If any trucks are in contact with contaminated soil they will be decontaminated before leaving the Site.
3. The excavation work plan outlines dust and erosion control measures during excavation, stockpiling, loading and transportation activities. Dust control measures (e.g., water spraying or use of dust palliative) will be required to be implemented during excavation of impacted soil. The type and frequency of the dust control

measures will depend on the results of the real time visual air monitoring. Air monitoring during the excavation will confirm that the dust controls implemented are effective.

4. A Site Health and Safety Plan, prepared and implemented in accordance with state and federal requirements Title 8 CCR 5192 and 29 Code of Federal Regulation (CFR) 1910.120, will ensure the protection of workers and the public during the removal action.
5. All wastes, both hazardous and nonhazardous, generated during the cleanup will be properly disposed of at an off-site facility. The transport of any hazardous wastes generated during the removal action will be manifested and a registered hazardous waste transporter will be used to transport hazardous wastes to permitted disposal facilities. Nonhazardous waste will be tracked with a standard bill of lading.

<u>Randy S. Adams, C.E.G.</u>	<u>Sr. Engineering Geologist</u>	<u>916-255-3591</u>
Project Manager Name	Project Manager Title	Phone #
<u>Branch Chief Signature</u>		<u>Date</u>
<u>James L. Tjosvold, P.E.</u>	<u>Chief NCCCOB</u>	<u>916-255-3730</u>
Branch Chief Name	Branch Chief Title	Phone #

TO BE COMPLETED BY OPR ONLY

Date Received For Filing and Posting at OPR: